

ANDREA T. MARTINEZ, United States Attorney (#9313)  
VICTORIA K. McFARLAND, Assistant United States Attorney (#11411)  
Attorneys for the United States of America  
Office of the United States Attorney  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682

FILED US District Court-UT  
MAR 09 '22 PM12:04

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD LYNN CLEAVELAND,

Defendant.

**INDICTMENT**

Count I: 18 U.S.C. § 922(a)(6), False Statement During Attempted Acquisition of Firearms.

Case: 2:22-cr-00085  
Assigned To : Waddoups, Clark  
Assign. Date : 3/9/2022

The Grand Jury Charges:

**COUNT I**

18 U.S.C. § 922(a)(6)

(False Statement During Attempted Acquisition of Firearms)

On or about February 17, 2022, in the District of Utah,

TODD LYNN CLEAVELAND,

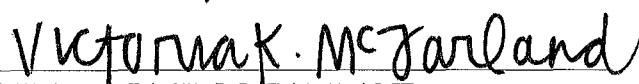
defendant herein, in connection with the attempted acquisition of firearms, to wit: two Savage Arms 12 gauge shotguns, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that he falsely answered "no" on

ATF form 4473 asking whether he had ever been convicted in any court of a crime punishable by imprisonment for a term of more than one year, and, as he then knew, his answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON OF GRAND JURY

ANDREA T. MARTINEZ  
United States Attorney

  
VICTORIA K. McFARLAND  
Assistant United States Attorney